

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Winston-Salem Regional Office
County: Rockingham
NC Facility ID: 7900093
Inspector's Name: Read Plott
Date of Last Inspection: 03/02/2016
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Ball Metal Beverage Container Corp.</p> <p>Facility Address: Ball Metal Beverage Container Corp. 1900 Barnes Street Reidsville, NC 27320</p> <p>SIC: 3411 / Metal Cans NAICS: 332431 / Metal Can Manufacturing</p> <p>Facility Classification: Before: Title V After: Fee Classification: Before: Title V After:</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 02D: .0515, .0516, .0521, .0524, .0958, .1100, .1111, .1806 02Q: .0317, .0711 NSPS: Subparts WW, JJJ NESHAP: Subpart ZZZZ PSD: n/a PSD Avoidance: VOC NC Toxics: 02D .1100, 02Q .0711 112(r): n/a Other: n/a</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Jeffery Boehler EHS Manager (336) 342-7373 1900 Barnes Street Reidsville, NC 27320</p>	<p style="text-align: center;">Authorized Contact</p> <p>Thomas Flairty Assistant Plant Manager (336) 342-7280 1900 Barnes Street Reidsville, NC 27320</p>	<p style="text-align: center;">Technical Contact</p> <p>Robert Hall Principal Engineer (303) 460-5445 9300 West 108th Circle Broomfield, CO 80021+3682</p>	<p>Application Number: 7900093.16A Date Received: 09/01/2016 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03662/T24 Existing Permit Issue Date: 01/30/2013 Existing Permit Expiration Date: 12/31/2017</p>

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	0.0300	5.14	156.60	4.33	3.65	11.87	8.81 [Formaldehyde]
2014	0.0400	5.81	195.04	4.89	4.24	12.58	8.81 [Formaldehyde]
2013	0.0400	5.50	183.68	4.62	4.03	14.88	8.81 [Formaldehyde]
2012	0.0400	5.47	189.34	4.59	3.99	15.89	8.64 [Formaldehyde]
2011	0.0400	5.47	205.32	4.59	5.19	18.33	9.27 [Glycol ethers (total all indiv)]

<p>Review Engineer: Russell Braswell</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 03662/T25 Permit Issue Date: Permit Expiration Date:</p>
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1. Purpose of Application:

Ball Metal Beverage Container Corp. (BMBCC) currently operates a facility in Reidsville NC under Air Quality Permit No. 03662T24. This permit has an expiration date of December 31, 2017. BMBCC has submitted this permit application in order to renew the permit. Because the renewal application was received at least nine months before the expiration date, the current permit will remain in effect, regardless of the expiration date, until this permit application is approved or denied.

2. Facility Description:

"The facility manufactures 12 ounce, 16 ounce, and tall 12 ounce aluminum cans, mostly for beer companies such as MillerCoors. They operate 24 hours per day, 7 days per week, for 52 weeks each year."¹

3. History/Background Since the Previous Permit Renewal:

The permit was previously renewed on January 30, 2013. Since that renewal, there have been no additional permit actions.

4. Application Chronology:

- September 7, 2016 Application received.
- September 13, 2016 An initial draft of the review and permit were sent to DAQ staff (Mark Cuilla, Tom Anderson, Samir Parekh, Jalal Adouli, Davis Murphy) and BMBCC staff (Bob Hall, Jeff Boehler). For a summary of comments received, see Attachment 2.
- XXXXX Public / EPA Notice
- XXXXX Permit issued.

5. Permit Modifications/Changes and TVEE Discussion:

The list of changes to the permit can be found in Attachment 1.

6. Regulatory Review:

BMBCC is subject to the following regulations, in addition to the requirements in the General Conditions:

- 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
- 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .0524 "New Source Performance Standards" (40 CFR Part 60, Subparts WW, JJJJ)
- 15A NCAC 02D .0958 "Work Practices for Sources of Volatile Organic Compounds"
- 15A NCAC 02D .1100 "Control of Toxic Air Pollutants"
- 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (40 CFR Part 63, Subpart ZZZZ)
- 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"
- 15A NCAC 02Q .0317 "Avoidance Conditions" (PSD Avoidance, MACT Avoidance)

¹ From Read Plott's inspection report, dated March 2, 2016.

- 15A NCAC 02Q .0711 "Emission Rates Requiring a Permit"

An extensive review for each applicable regulation is not included in this document, as the facility's status with respect to these regulations has not changed. The permit will be updated to reflect the most current stipulations for all applicable regulations.

7. NSPS, MACT/GACT, PSD/NSR, 112(r), RACT, CAM:

a. 40 CFR Part 60: New Source Performance Standards (NSPS)

1. *Subpart Dc "Small Industrial-Commercial-Institutional Steam Generating Units"*

According to §60.40c(a), this rule only applies to boilers that have a heat input capacity greater than 10 mmBtu/hr. All of the boilers at this facility are smaller than this threshold, so this rule does not apply.

2. *Subpart WW "Beverage Can Surface Coating Industry"*

This rule applies to can coating facilities that were constructed or modified after November 26, 1980. This facility is therefore subject to this rule.

The rule has different VOC emission limits based on the nature of the coating process. The rule lays out specific testing and calculation methods to determine VOC emissions from each process. The facility must keep records of calculations and the information used to make the calculations, and must report these records on a regular basis.

Continued compliance with this rule is expected.

3. *Subpart JJJJ "Stationary Spark Ignition Internal Combustion Engines"*

This rule applies to all new stationary spark-ignition engines. Based on the size (19 kW) and installation date (December 2006) of the engine, there are no applicable requirements under the rule.

b. 40 CFR Part 63: Maximum/Generally Available Control Technology (MACT/GACT)

This facility is avoiding HAP-Major status by limiting HAP emissions to less than the major source thresholds. In order to demonstrate its status as an area source (i.e. not HAP-Major), the facility must calculate and keep records of annual HAP emissions. Records of these calculations must be reported on a regular basis.

1. *Subpart KKKK "Surface Coating of Metal Cans"*

According to §63.3481, this rule only applies to HAP-Major sources. Therefore, this rule does not apply.

2. *Subpart ZZZZ "Stationary Reciprocating Internal Combustion Engines"*

This rule applies to all stationary engines. For engines that are subject to NSPS Subparts IIII or JJJJ, the only requirements under this rule are to comply with the applicable NSPS.

This rule only applies to a source on the Insignificant Activities List. Therefore, the permit will not contain a condition for this rule. Even though this rule won't appear in the permit, the facility must still comply with the requirements.

3. *Subpart JJJJJ "Industrial, Commercial, and Institutional Boilers Area Sources"*

According to §63.11195(e), gas-fired boilers (as defined in §63.11237) are not subject to this rule. All of the boilers at this facility meet the definition of gas-fired. Therefore, this rule does not apply.

c. Prevention of Significant Deterioration (PSD)

This facility is avoiding triggering a PSD review by limiting facility-wide VOC emissions to less than 250 tons per year. In order to demonstrate compliance with this emission limit, the facility must make monthly VOC emission calculations. The results of these calculations must be recorded and reported regularly.

Continued compliance with this rule is expected.

d. Section 112(r) of the Federal Clean Air Act

The facility does not appear to store any 112(r)-subject materials above their respective thresholds. Therefore, the facility does not have any increased requirements under Section 112(r) of the Clean Air Act.

e. Reasonably Available Control Technology (RACT)

The facility is not located in an area of ozone nonattainment, therefore RACT does not apply.

f. Compliance Assurance Monitoring (CAM)

CAM applies to a control device if the following criteria are met:

1. The unit being controlled is subject to a non-exempt emission standard (as defined by 2D .0614(b)(1)),
2. The control device is being used to comply with the emission standard, and
3. The unit being controlled has potential emissions of the pollutant subject to the emission standard of greater than major source thresholds.

The only pollutants for which the facility has the potential to exceed the major source threshold are VOC and HAP. The facility does not use any control devices for these pollutants, so CAM does not apply.

8. Toxic Air Pollutants

The facility has two state-enforceable only TAP emission limits under 02D .1100 and 02Q .0711.

a. 02D .1100

This facility has previously submitted a modeling demonstration in order to show compliance with the acceptable ambient limit (AAL) for formaldehyde. The modeled emission rates are included in the permit as emission limits. The only requirement to demonstrate compliance with the emission limits is a facility-wide limit on the number of aluminum cans coated.

Continued compliance with this rule is expected.

b. 02Q .0711

The facility has previously been examined for TAP emissions. It was determined that several TAPs did not require a modeling demonstration, provided emissions stay below the limits in 02Q .0711. The examined TAPs are listed in the permit. The facility is required to keep records that demonstrate compliance with the limits in 02Q .0711.

Continued compliance with this rule is expected.

9. Facility Emissions Review

This permit renewal is not expected to change potential emissions from this facility.

For a historical review of actual emissions from this facility, see the summary table on the first page of this review.

10. Compliance Status

a. Notices of Violation/Recommendation for Enforcement since the previous renewal

None.

b. Inspection status

The facility was most recently inspected on March 2, 2016 by Read Plott. BMBCC appeared to be in compliance with the air quality permit at the time of that inspection.

11. Other Regulatory Concerns

A PE seal was not required for this permit renewal.

A zoning consistency form was not required for this permit renewal.

12. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA.

Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above.

13. Recommendations

Issue permit 03662T25.

Change List

Pages*	Section*	Description of Changes
Throughout	Throughout	<ul style="list-style-type: none">• Changed "2D" and "2Q" to "02D" and "02Q".• Fixed formatting• Updated dates/permit numbers
n/a	Insignificant Activities List	<ul style="list-style-type: none">• Minor corrections based on inspection report.
	2.2.A.	<ul style="list-style-type: none">• Reordered stipulations to match appearance in the NCAC.
	2.2.A.4.	<ul style="list-style-type: none">• Removed paragraph d. because this only repeated requirements in paragraphs b. and c.
	2.2.A.5.	<ul style="list-style-type: none">• Specified that the emission limits are taken from 02Q .0711(a).
	3.	<ul style="list-style-type: none">• Updated General Conditions to v4.0.

* This refers to the current permit unless otherwise stated.

Comments Received on Initial Draft

- Mark Cuilla, by email on September 21, 2016

Mark pointed out typos in the draft permit and review.

Response: I have fixed these typos.

- Robert Hall, by email on September 26 and October 12, 2016

Robert had two comments on the draft:

1. The emergency generator is natural gas-fired. The draft indicates that it is propane fired, and this should be changed.

Response: I added propane based on the most recent inspection report. In a later email, Robert confirmed that the generator is natural gas-fired, and not propane-fired.

2. The emergency generator was installed at the facility in December 2006. Based on his reading of NSPS Subpart JJJJ, Robert determined that there were no applicable requirements for the generator.

Response: I agree with this assessment, based on the installation date. I have added the installation date to the source's description in the permit to prevent future confusion.